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16

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 COLUMBIA PICTURES INDUSTRIES,
INC., et al.,

Case No. CV 06-5578-SVW (JCx)

20 Plaintiffs,

DEFENDANTS GARY FUNG AND
ISOHUNT WEB TECHNOLOGIES,
INC.'S PRETRIAL DISCLOSURE OF
WITNESSES

21 v.

22 GARY FUNG, et al.,

Pretrial Conference: October 28, 2013
Trial Date: November 5, 2013

23 Defendants.

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1 Pursuant to Local Rule 16-2.4, Defendants Gary Fung and isoHunt Web
2 Technologies, Inc., ("Defendants") through their attorneys, submit this list of trial
3 witnesses. Defendants reserve the right to supplement, modify or amend this witness
4 list as necessary, depending upon the witness or exhibit designations of Plaintiffs, the
5 outcome of the parties' conferences on pretrial matters, in response to Plaintiffs' case,
6 and any applicable rulings of the Court, or other developments. Defendants also
7 reserve the right to designate deposition testimony should any of the listed witnesses
8 become unavailable.

9 **Gary Fung**

10 **Robin Johnson**

11 **Allen Parker**

12 **Steven Gribble** (expert witness)

13 **Christian Tregillis** (expert witness): Mr. Tregillis will analyze financial,
14 economic and accounting issues related to claims by Plaintiffs against Defendants for
15 copyright infringement. The scope of his testimony will depend upon which
16 documents by Plaintiffs are ultimately produced, including regarding revenue, profits
17 and licensing regarding the alleged works-in-suit, which will require Magistrate Judge
18 Chooljian to resolve the pending disputes relating to financial and valuation discovery
19 relating to the calculation. Once additional discovery becomes available, Mr. Tregillis
20 expects to be able to offer an informed analysis of statutory damages and factors
21 relevant to such a determination, as well as actual damages and the calculation of
22 Defendants' profits, and will thereafter provide his report.

23 **Koleman Strumpf** (expert witness): Mr. Strumpf has conducted economic
24 studies on the impact of file-sharing and unauthorized downloads on content sales, the
25 balance of positive and negative effects, and has conducted extensive research on
26 BitTorrent technology. Mr. Strumpf intends to offer testimony on these topics,
27 including with respect to movies released in the theatre as well as television episodes.
28 Plaintiffs just identified their current list of claimed works last week, which directly

1 impacts Mr. Strumpf's analysis. The scope of his testimony will also depend upon
2 which documents by Plaintiffs are ultimately produced, including regarding sales of
3 the alleged works-in-suit, which will require Magistrate Judge Chooljian to resolve the
4 pending disputes relating to financial and valuation discovery relating to the
5 calculation. Mr. Strumpf intends to incorporate additional relevant discovery once
6 produced, and will thereafter provide his report.

7 ***Plaintiffs' witnesses (by designation)**

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12 Dated: October 7, 2013

WINSTON & STRAWN LLP

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By: /s/ Erin R. Ranahan

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